

1 DANIEL F. GAINES, ESQ. SBN 251488
daniel@gaineslawfirm.com

2 ALEX P. KATOFISKY, ESQ. SBN 202754
alex@gaineslawfirm.com

3 EVAN S. GAINES, ESQ. SBN 287668
evan@gaineslawfirm.com

4 **GAINES & GAINES, APLC**
5 4550 East Thousand Oaks Boulevard, Suite 100
Westlake Village, CA 91362
6 Telephone: (818) 703-8985
7 Facsimile: (818) 703-8984

8 Attorneys for Plaintiffs Jessica Vargas Zaragoza, Sean
Richardson, Kayla Salas, Selina Taing, Alizae Vargas,
9 and Ricki Freitas and Proposed Class Counsel

10 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
11 **FOR THE COUNTY OF LOS ANGELES – SPRING STREET COURTHOUSE**
12

13 JESSICA VARGAS ZARAGOZA, on behalf
14 of herself and on behalf of all similarly
situated individuals,

15 Plaintiffs,

16 v.

17
18 AMERICAN TAX SOLUTIONS, a California
corporation, and DOES 1 through 10,
19 inclusive,

20 Defendants.
21
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CASE NO: 22STCV09469

*Assigned to the Hon. Carolyn B. Kuhl, Dept.
12*

CLASS ACTION

**DECLARATION OF ALIZAE VARGAS
IN SUPPORT OF UNOPPOSED MOTION
FOR PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT**

DATE: September 5, 2023

TIME: 11:00 a.m.

DEPT.: SS-12

Complaint Filed: March 17, 2022

1 I, ALIZAE VARGAS, hereby declare and state as follows:

2 1. I am a named Plaintiff in this lawsuit against Defendant American Tax
3 Solutions ("Defendant") and I submit this declaration in support of Plaintiffs'
4 Unopposed Motion for Preliminary Approval of Class Action Settlement. I am a
5 competent adult and worked for Defendant as a non-exempt employee in Los Angeles
6 County during the relevant time period. I have personal knowledge of the facts set forth
7 herein, and if called as a witness to testify to them, I could and would do so competently.

8 2. I contacted my current attorneys when I questioned the employment
9 practices of Defendant prior to the commencement of this lawsuit. I accepted the
10 opportunity to act as a Class Representative in a class action on behalf of other
11 employees of Defendant who I believed were being put through to labor law violations.
12 Although presented with the opportunity, I did not pursue this case on an individual
13 basis and instead did so as a class action so that I could help other employees recover for
14 what I believed were Defendant's illegal practices.

15 3. Specifically, I questioned Defendant's policies of failing to pay all wages,
16 failing to provide all meal and rest periods, failing to reimburse expenses, failing to
17 timely compensate employees upon separation, and issuing its employees deficient wage
18 statements. Through constant contact with my lawyers, I learned these may be illegal
19 practices and Defendant's employees might have recourse for them.

20 4. By bringing forward this lawsuit, and throughout its course, I have put the
21 interests of the class ahead of my own. I recognize that I could possibly earn a small
22 enhancement payment if this case resolved itself favorably, but always knew that I could
23 also be responsible for paying Defendant's attorneys' fees and costs if it did not. My
24 purpose in bringing this lawsuit was to obtain a recovery on behalf of the class, and even
25 more importantly, to put an end to what I believed were illegal practices on the part of
26 Defendant. I believe I have achieved both through this lawsuit and settlement.

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1 5. I am very content about the results of this litigation. I am glad that
2 Defendant is compensating class members for unpaid wages, premium wages for missed
3 meal and rest periods, expenses, penalties, and interest that I believe we are owed.

4 6. At the beginning of this case, I spent time through various phone calls
5 with several of my attorneys explaining what I understood to be the policies and
6 procedures of Defendant and how they were applied to me and others I worked with.
7 During the course of this litigation, up through and following the settlement process, I
8 kept diligently involved with its status, tracking the status of the case, and participating
9 as actively as possible.

10 7. While I have not kept detailed time records of my activities in connection
11 with this litigation, I believe to have spent a total of approximately 18.5 hours helping
12 my attorneys with the preparation of this case and doing work and analysis independent
13 from my attorneys both before and during this case, including conducting an
14 independent investigation of the facts and attending a full-day mediation.

15 8. At the beginning of this litigation, and throughout its course, I have spent
16 approximately 11.5 or more hours gathering, organizing, and reviewing documents and
17 information for this lawsuit. I sifted through many of my own documents and reviewed
18 information produced by Defendant as part of this case.

19 9. I have maintained constant contact with my attorneys several times per
20 month to track my case's status. I have taken an active involvement in this matter
21 throughout its course, including helping my attorneys at the mandatory settlement
22 conferences and at my deposition.

23 10. This lawsuit will almost certainly result in reputational damage to me.
24 There is a stigma associated with suing anyone, let alone your former employer. I will
25 probably be adversely affected when it comes to obtaining future employment –
26 employers who learn that I sued Defendant in a class action will likely avoid hiring me.

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11. I do not believe that I have any conflicts with other members of the class. My interests in bringing this lawsuit – for Defendant to change its labor practices going forward and to recompense current and former employees – are the same as those of all other class members.

I declare, under penalty of perjury, under the laws of the State of California that the foregoing is true and correct.

Executed on this 31st day of July, 2023 at Anaheim, California.

Alizee Vargas

ALIZAE VARGAS

Title	Signature for Declaration
File name	Vargas Decl v1.doc
Document ID	517c5f5c97df79853fc21caa072e02f71c308464
Audit trail date format	MM / DD / YYYY
Status	 Signed

Document history

 SENT	07 / 31 / 2023 22:15:38 UTC	Sent for signature to Alizae Vargas [redacted] from office@gaineslawfirm.com [redacted]
 VIEWED	08 / 01 / 2023 15:59:53 UTC	Viewed by Alizae Vargas [redacted] [redacted]
 SIGNED	08 / 01 / 2023 16:30:34 UTC	Signed by Alizae Vargas [redacted] [redacted]
 COMPLETED	08 / 01 / 2023 16:30:34 UTC	The document has been completed.